

**EXHIBIT A**

1  
COPY  
1

2 UNITED STATES DISTRICT COURT  
3

SOUTHERN DISTRICT OF NEW YORK

4 -----X  
5

DIEGO SANTIAGO,

6 Plaintiff,  
7

vs.

8 VILLAGE OF OSSINING POLICE  
DEPARTMENT,  
9

10 Defendant.  
11 -----X  
12

13 DEPOSITION OF DIEGO SANTIAGO  
14 New York, New York  
15 April 11, 2007  
16  
17  
18  
19  
20  
21

22 Reported by:  
23 Bonnie Pruszynski, RMR  
JOB NO. 172176  
24  
25

119

Diego Santiago

2           A         Well, three that I found, and some  
3 officers that are friends of mine had been there a  
4 long time, had the decency to remove them and get  
5 rid of them before they came in, and there were  
6 certain supervisors that saw them and neglected to  
7 do it.

8 Q Other than the posting of the  
9 article, did anything happen to you because the  
10 article appeared in the local newspaper?

11 A Did anything physically or mentally?

12 Q Anything relating that you can  
13 describe, anything related to --

14 A I can describe that when I call out  
15 for a vehicle, I don't get the back up.

16 Q And you think that is because of the  
17 petition or the article?

18 A I don't know if it was the petition  
19 or the article or what.

20 Q So, when you say you don't recall,  
21 you call in, you don't get the back up, what are  
22 you referring to?

23 A I feel like I am being left alone out  
24 there.

25 Q Why do you think that is happening?

1                   Diego Santiago

2                   A       I don't have an exact answer.

3                   Q       Okay. Are there any other facts --  
4 let me back up a moment.

5                                  You testified that you feel you were  
6 retaliated against for applying for the detective  
7 position.

8                                  Do you recall that testimony?

9                   A       Yes.

10                  Q       Are there any other facts that  
11 support your retaliation claim?

12                  A       Not at this time.

13                  Q       Can you give examples of when you  
14 weren't given backup?

15                  A       I didn't keep notes of that.

16                  Q       I would like to show you a document  
17 that -- well, let's mark this as -- what are we up  
18 to? 11.

19                                  (Exhibit Number P-11 marked for  
20 identification as of this date.)

21                  A       I guess this is another occasion I  
22 forgot.

23                  Q       Ready?

24                                  Officer Santiago, I would like to ask  
25 you to look at the document that's been marked as

121

1 Diego Santiago

2 P-11 for identification, and I would like to ask  
3 you, first, have you ever seen this document  
4 before?

5           A         *Actually, I saw it a little while*  
6       *ago.*

7 Q Today you mean?

8 A Today.

9 Q Is this an incident you are referring  
10 to where you weren't given backup?

11 A No, this was not one of them.

12 Q Can you tell me what this document  
13 refers to?

14 A Well, I guess it's refers to a time I  
15 was walking on the area where a burglary was in  
16 progress, I happened to be the first one at the  
17 scene, and I guess there was a misunderstanding  
18 between me and the officer.

19 Q Okay. What was the nature of the  
20 misunderstanding?

21           A         Oh, well, I guess -- I guess there  
22 are several items on this. I don't know which one  
23 you are referring to.

24 Q Well, you said there was a  
25 misunderstanding with the officers

186

1  
2                   C E R T I F I C A T E

3 STATE OF NEW YORK         )

4                   : SS.

5 COUNTY OF NEW YORK         )

6  
7                   I, BONNIE PRUSZYNSKI, a Notary  
8                   Public with and for the State of New York,  
9                   do hereby certify:

10                  That DIEGO SANTIAGO, the witness  
11                  whose deposition is hereinbefore set forth,  
12                  was duly sworn by me and that such deposition  
13                  is a true record of the testimony given by  
14                  the witness.

15                  I further certify that I am not related  
16                  to any of the parties to this action by  
17                  blood or marriage, and that I am in no way  
18                  interested in the outcome of this matter.

19                  IN WITNESS WHEREOF, I have hereunto  
20                  set my hand this 25th of April, 2007.

21  
22                     
23                   Bonnie Pruszynski